

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

**JEREMY ROSSMEISL AND GUY LAUTURE,
on behalf of themselves and all others similarly
situated,**

Plaintiffs,

-against-

A.C. MOORE ARTS & CRAFTS, INC.,

Defendant.

Case No. 17-cv-10219

**PLAINTIFFS' ASSENTED-TO MOTION FOR APPROVAL OF SETTLEMENT,
SERVICE AWARDS, AND ATTORNEYS' FEES AND COSTS**

Plaintiffs respectfully submit the following Assented-To Motion for Approval of Settlement, Service Awards, and Attorneys' Fees and Costs ("Motion"). For the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Motion, the Declarations of Justin M. Swartz, Gregg I. Shavitz, and Hillary Schwab, and the exhibits attached thereto, Plaintiffs respectfully request that the Court enter an Order:

- (1) approving the \$2,900,000.00 settlement set forth in the Joint Stipulation of Settlement and Release;
- (2) approving the proposed Notice of Settlement and Opportunity to Join Collective Action and Claim Form ("Notice of Settlement") and directing its distribution;
- (3) approving Service Awards of \$15,000 to each of the Named Plaintiffs for their service to the Collective;
- (4) approving Plaintiffs' request for one-third of the settlement fund for attorneys' fees, plus reimbursement of costs and expenses;

(5) approving the Settlement Administrator's fees and costs;
(6) incorporating the terms of the Settlement Agreement;
(7) dismissing the action without prejudice, which will become dismissal with prejudice if no motion to reinstate is filed on or before 180 days after the Notice of Settlement is mailed to the Collective.

Dated: April 10, 2017
New York, New York

Respectfully submitted,

/s/ Justin M. Swartz

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*Attorneys for Plaintiffs and
the Putative Settlement Class*

RULE 7.1 CERTIFICATION

The undersigned does hereby certify that counsel for the Plaintiffs conferred with Defendant's counsel, and Defendant does not oppose Plaintiffs' Motion.

Dated: April 10, 2017

New York, New York

By: /s Justin M. Swartz

Justin M. Swartz (admitted *pro hac vice*)

CERTIFICATION OF SERVICE

I hereby certify that on April 10, 2017 a copy of the foregoing documents were filed electronically and service made by certified mail to anyone unable to accept electronic filing. Notice of this filing will be sent by email to all parties by operation of the Court's electronic filing system or by certified mail for anyone unable to accept electronic filing. Parties may access this filing through the Court's system.

/s/ Justin M. Swartz

Justin M. Swartz